

POLICY

TITLE:	Participant Files/Records Management	PROGRAM:	Adult/DLW/Youth
EFFECTIVE DATE:	03/01/2020	REVISIONS:	

A. Retention of Records

1. Records will be retained in accordance with established requirements. A Program Operator or Sub-Recipient (here after referred to as Operator) will notify the Consortium Staff Representative prior to destroying any records pertinent to the contract. Participants records must be retained for a minimum of the (3) years after completion of last clean audit while financial records must be retained for a minimum of five (5) years. Both participant and financial records should be maintained in a secured locked file cabinet or other secured arrangement.
2. Records will be retained if audit findings have not been resolved until such time as the requirements in (1) above have been met.

B. Participants Files/Record Transfer

Should an Operator cease operations or if another Operator is awarded a contract to provide service delivery in lieu of the former Operator, the following participant files/records storage and/or transfer provisions will apply.

1. The current Operator is responsible for the completeness/accuracy of all participant files/records until such time as those records are turned over to the WDB. The Operator will be required to sign a statement, provided by the WDB, attesting to the completeness/accuracy of all participant files/records in their possession that will be transferred to the WDB. Even after transfer, the Operator retains responsibility and liability for all activities that occurred during the period functioning as an Operator for the WDB.
2. The WDB will secure all participant files/records providing the Operator with an acceptance receipt. The WDB will be responsible for the security and storage of all files/records obtained from the Operator.
3. In the event that a new Operator has been awarded a contract to deliver services previously performed by the former Operator, the new Operator assumes responsibility and liability for all actions occurring once they are in receipt of the files/records. The WDB will insure that original documents for all active participants are provided to the new Operator and copies of those documents are placed in the original file secured from the former Operator and retained in storage. The new Operator will sign an acceptance letter provided by the WDB, listing all files/records that have been provided to them by the WDB and accepting responsibility/liability for the maintenance of those files/records. For participants who have exited and are no longer receiving any services, including follow-up, all files/records for those participants will remain in storage. The former Operator will provide the following at time of transfer:

- a. A full client list.
 - b. A separate list differentiating active and inactive participants by name and State ID number.
 - c. A chain of custody document signed by all parties including date of transfer, recipient entity and any transfer issues.
4. All secured participant files/records will be retained by the WDB for a minimum of three (3) years following completion of the last clean audit. Financial records will be retained for a minimum of five (5) years. The WDB will pay all storage costs for all effected documents. The WDB will also be responsible for destruction of documents once the required retention period has expired. Should any issues arise concerning records transferred to the new Operator, the WDB will act as a mediator between both Operators to insure that a resolution to the issue is achieved in a timely manner.

C. Client File Storage

Operators shall properly mark client records before placing in storage as follows:

1. All current exited files need to have the outside of the file marked with client exit date and the program the client participated in (DLW, Adult, Youth). This process also applies to all client files currently being exited and those files that are currently in follow up.
2. Client files that are no longer in follow up services need to be stored by Exit Date and placed in alphabetical order.
3. Client files in storage should have the exit date (program year), program participation (DLW, Adult, Youth), and the alpha letters (A-D, E-J, etc.) of the client files contained within marked clearly on the outside of the filing cabinet or file box that the files are stored in.

D. Disposal of Participant/Financial Records

Those records that have exceeded the minimum retention requirements outlined above in Section A are eligible for disposal as follows:

1. All records must be destroyed utilizing either a shredding or incineration process that certifies in writing the specific records destroyed and the date this occurred.
2. All disposal certifications must be maintained on file as documentation of specific records being properly disposed.